UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

ADA MERCEDES CONDE VIDAL and IVONNE ÁLVAREZ VÉLEZ; MARITZA LÓPEZ AVILÉS and IRIS DELIA RIVERA RIVERA; JOSÉ A. TORRUELLAS IGLESIAS and THOMAS J. ROBINSON; ZULMA OLIVERAS VEGA and YOLANDA ARROYO PIZARRO; JOHANNE VÉLEZ GARCÍA and FAVIOLA MELÉNDEZ RODRÍGUEZ; and PUERTO RICO PARA TOD@S,

Civil Action No. 3:14-cv-01253- GAG

Plaintiffs,

v.

ALEJANDRO J. GARCÍA PADILLA, in his official capacity as Governor of the Commonwealth of Puerto Rico; ANA RÍUS ARMENDÁRIZ, in her official capacity as Secretary of the Health Department of the Commonwealth of Puerto Rico; WANDA LLOVET DÍAZ, in her official capacity as Director of the Commonwealth of Puerto Rico Registrar of Vital Records; and JUAN C. ZARAGOSA GÓMEZ, in his official capacity as Director of the Treasury in Puerto Rico,

Defendants.

JOINT MOTION FOR ENTRY OF JUDGMENT

In light of the decisions of the United States Court of Appeals for the First Circuit in *In re: Conde-Vidal*, No. 16-1313 (1st Cir. Apr. 7, 2016) (Docket No. 70), and the United States Supreme Court in *Obergefell v. Hodges*, 576 U.S. ____, 135 S. Ct. 2584 (2015), Plaintiffs Ada M. Conde Vidal and Ivonne Álvarez Vélez, by and through their attorney; Plaintiffs Maritza López Avilés and Iris Delia Rivera Rivera, José A. Torruellas Iglesias and Thomas J. Robinson, Zulma Oliveras Vega and Yolanda Arroyo Pizarro, Johanne Vélez García and Faviola Meléndez

Rodríguez, and the organization Puerto Rico Para Tod@s, by and through their attorneys (collectively "Plaintiffs"); and Defendants Alejandro García Padilla, in his official capacity as Governor of the Commonwealth of Puerto Rico; Ana Ríus Armendáriz, in her official capacity as Secretary of the Health Department of the Commonwealth of Puerto Rico; Wanda Llovet Díaz, in her official capacity as Director of the Commonwealth of Puerto Rico Registrar of Vital Records; and Juan C. Zaragosa Gómez, in his official capacity as Director of the Treasury in Puerto Rico, by and through their attorneys, respectfully move this Court to enter the enclosed proposed judgment in favor of Plaintiffs.

WHEREFORE, in light of *Obergefell v. Hodges* and the judgment of the Court of Appeals for the First Circuit, the parties hereby jointly move this Court to enter the enclosed proposed judgment in favor of Plaintiffs.

Dated: April 9, 2016

Cesar R. Miranda Rodríguez Secretary of Justice

Marta Elisa González Yglesias Deputy Secretary, Civil Matters

Wandymar Burgos Vargas Director, Federal Litigation and Bankruptcy

/s/ Idza Díaz Rivera

Idza Díaz Rivera (USDC 223404)
Federal Litigation Division
DEPARTMENT OF JUSTICE
COMMONWEALTH OF PUERTO RICO
P.O. Box 9020192
San Juan, Puerto Rico 00902-0192
T: (787) 721-2940, Ext. 2606
idiaz@justicia.pr.gov

Counsel for Defendants Alejandro J.
García-Padilla, in his official capacity as
Governor of the Commonwealth of Puerto
Rico; Ana Ríus-Armendáriz, in her official
capacity as Secretary of the Health
Department of the Commonwealth of Puerto
Rico; Wanda Llovet Díaz, in her official
capacity as the Director of the
Commonwealth of Puerto Rico Registrar of
Vital Records; Juan C. Zaragosa-Gomez, in
his official capacity as Director of the
Treasury in Puerto Rico.

/s/ Ada M. Conde-Vidal
Ada M. Conde-Vidal (USDC 206209)
CONDE ATTORNEY AT LAW, PSC
P.O. Box 13268
San Juan, PR 00908-3268
(787) 721-0401
condelawpr@gmail.com

Counsel for Plaintiffs Ada M. Conde Vidal and Ivonne Álvarez Vélez

Respectfully submitted,

/s/ Omar Gonzalez-Pagan

Omar Gonzalez-Pagan (pro hac vice)
Hayley Gorenberg (pro hac vice)
LAMBDA LEGAL DEFENSE AND
EDUCATION FUND, INC.
120 Wall Street, 19th Floor
New York, New York 10005-3904

T: (212) 809-8585 | F: (212) 809-0055 ogonzalez-pagan@lambdalegal.org hgorenberg@lambdalegal.org

Gary W. Kubek (pro hac vice)
Harriet M. Antczak (pro hac vice)
Jing Kang (pro hac vice)

DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, New York 10022
T: (212) 909-6000 | F: (212) 909-6836
gwkubek@debevoise.com
hmantcza@debevoise.com
ikang@debevoise.com

Ryan M. Kusmin (pro hac vice) **DEBEVOISE & PLIMPTON LLP**555 13th Street N.W.

Washington, District of Columbia 20004

T: (202) 383-8000 | F: (202) 383-8118

rmkusmin@debevoise.com

Celina Romany-Siaca (USDC 121811) CELINA ROMANY LAW OFFICES 268 Muñoz Rivera Avenue, Suite 1500 San Juan, Puerto Rico 00918 T: (787) 754-9304 | F: (787) 754-9324 bufetecelinaromany@gmail.com

Counsel for Plaintiffs Maritza López Avilés and Iris Delia Rivera Rivera; José A. Torruellas Iglesias and Thomas J. Robinson; Zulma Oliveras Vega and Yolanda Arroyo Pizarro; Johanne Vélez García and Faviola Meléndez Rodríguez; and Puerto Rico Para Tod@s.

CERTIFICATE OF SERVICE

I, Omar Gonzalez-Pagan, an attorney, certify that on April 9, 2016, I served upon counsel for all parties by electronically filing the foregoing with the Clerk of the Court using the CM/ECF system.

/s/ Omar Gonzalez-Pagan

Omar Gonzalez-Pagan
LAMBDA LEGAL DEFENSE AND
EDUCATION FUND, INC.
120 Wall Street, 19th Floor
New York, New York 10005-3904
T: (212) 809-8585 | F: (212) 809-0055

ogonzalez-pagan@lambdalegal.org